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May 2, 2005

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

Re: *Dobson Cellular Systems, Inc.*  
*E911 Quarterly Report – CC Docket No. 94-102*

Dear Ms. Dortch:

Dobson Cellular Systems, Inc. and its subsidiaries, by its attorneys, hereby submit the attached E911 Quarterly Report on their progress toward and compliance with the terms and conditions of the *Order to Stay* and the Commission's E911 rules.<sup>1</sup>

If there are any questions regarding this matter, please contact the undersigned.

Sincerely,

WILKINSON BARKER KNAUER, LLP



By: Lawrence J. Movshin  
Lee J. Rosen

Attachment

cc: David Solomon, Chief, Enforcement Bureau  
John Muleta, Chief, Wireless Telecommunications Bureau  
John Newman, Executive Director, APCO  
Robert M. Gurss, Counsel for APCO  
Rob Martin, Executive Director, NENA  
James R. Hobson, Counsel for NENA and NASNA  
Steve Marzolf, President, NASNA

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<sup>1</sup> See *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, *Order to Stay*, 17 FCC Rcd 14841 (2002).

## **E911 Status – Quarterly Report**

**CC Docket No. 94-102**

**May 2, 2005**

### **Summary of Report**

Pursuant to the *Order to Stay* and the Commission's Public Notice dated June 6, 2003,<sup>1</sup> Dobson Cellular Systems, Inc.,<sup>2</sup> as a Tier II carrier, provides this E911 Quarterly Report ("Report"). The Report provides information on all Phase I and Phase II requests received by DCS, including: the PSAP ID, Name, State, County, Implementation Phase, Air Interface, Date PSAP Request Made, Date PSAP Request Withdrawn, Invalid Request, Deployed, Date Deployed, Date Projected, Reasons and Comment. Detailed information regarding the requests is contained in the attached chart.

In the course of preparing this E911 Quarterly Report, DCS very recently learned that its employee primarily responsible for the factual input for past reports did not have an accurate understanding of the legal standards appropriate to determine PSAP approval of extended deployment schedules. Steps have been and are being taken to assure that any factual representations made herein and in the future are complete and accurate in all respects. An analysis of the information in DCS's records has been undertaken under the more appropriate standards to prepare the instant report. To the extent that the information in the comment section of the instant report differs from that provided in earlier reports, such difference is intended to better reflect the state of DCS's discussions with the affected PSAPs as to the deployment dates that DCS can achieve.

### **Phase I Service**

DCS has received 84 requests for Phase I services and has activated service in all or in part of 80 of these jurisdictions. DCS has worked diligently with its third-party location solution vendor, Intrado, as well as the public safety community, in coordinating Phase I deployment. DCS remains committed to working with its vendors, the PSAPs, and state and local governments, in order to deploy Phase I services in these jurisdictions as soon as possible. As previously disclosed, on June 15, 2004, DCS completed the acquisition of NPI-Omnipoint Wireless, LLC ("NPI"). In the process, DCS acquired two outstanding Phase I E911 deployment requests, only one of which remains pending. The affected PSAP and counties, and the status of E911 deployment, are incorporated in the attached chart.

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<sup>1</sup> See *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, CC Docket No. 94-102, *Order to Stay*, 17 FCC Rcd 14841 (2002) ("*Order to Stay*"); See Public Notice, "Wireless Telecommunications Bureau Standardizes Carrier Reporting on Wireless E911 Implementation," DA 03-1902 (rel. June 6, 2003).

<sup>2</sup> The instant Report is filed on behalf of Dobson Cellular Systems, Inc. and its subsidiaries (collectively "DCS"). A separate report is being filed for American Cellular Corporation ("ACC"), which is an affiliate of DCS.

## **Phase II Service**

### **A. Deployment Preparation**

DCS is a mid-sized carrier servicing predominantly rural and suburban markets in 11 states. DCS relied primarily upon a TDMA-based network of base stations and switching equipment, but has since completed overlaying its TDMA network with GSM/GPRS technology. GSM technology is now operational and being used throughout DCS's network, which consists of approximately 22 Mobile Switching Centers, a majority of which utilize equipment manufactured by Nortel Networks ("Nortel"), the rest utilizing Lucent Technologies ("Lucent") TDMA network equipment. DCS has worked with these equipment vendors to prepare for Phase II deployment, as all switch upgrades necessary to supply Phase II services were completed by Lucent by August 2002 and by Nortel by June 2002.

DCS has executed an exclusive contract with Andrew Corporation to provide the Position Determining Entity equipment necessary to deploy a Phase II network-based location solution. The vendor has contracted to provide compliant Phase II services for all its Phase II requests. DCS has also executed a contract with Polaris Wireless to provide a software solution for E911 Phase II.

### **B. Phase II Requests**

DCS has launched Phase II service in the following jurisdictions: Kalkaska, Mason, Lake, Antrim, Charlevoix, Leelanau, Emmet, Benzie, Huron, Sanilac, Tuscola, Cheboygan, Alcona, Arenac, Clare, Crawford, Iosco, Isabella, Mackinac, Mecosta, Roscommon, Muskegon, Newaygo, Alpena, Ogemaw, Otsego, Montcalm, Alger and Gladwin counties, MI; Austin and Henderson counties, TX; Allegany, Cattaraugus, Chautauqua and Genesee counties, NY; Erie county, PA. DCS has received new requests since the last quarterly filing for Phase II service from the following jurisdictions: Garrett County, MD; Alger, Benzie and Gladwin Counties, MI; Grady County, OK; Erath, Navarro and Somervell Counties, TX. The status of these requests are detailed in the attachment. On June 15, 2004, DCS completed the acquisition of NPI-Omnipoint Wireless, LLC ("NPI"). In the process, DCS acquired numerous outstanding Phase II E911 deployment requests. The affected PSAPs and counties, and the status of E911 deployment for each, are incorporated in the attached chart.

To ensure that it may properly prioritize its E911-designated resources, DCS has requested each of these PSAPs to provide documentation pursuant to the *Richardson* criteria.<sup>3</sup> Although DCS has not yet received a response to its request from all of these PSAPs, it is proceeding in good faith and has signed a contract with Andrew Corporation and Polaris Wireless to provide Phase II capabilities in all DCS counties.

### **C. Deployment Issues**

DCS, as a rural carrier, has numerous markets that do not have the cell site density to provide accurate Phase II information. DCS has recently employed a software based solution that DCS hopes will yield more accurate results in these difficult markets. However, in markets

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<sup>3</sup> *Revision of the Commission's Rules to Ensure Compatibility with Enhanced E911 Emergency Calling Systems, Petition of City of Richardson*, CC Docket No. 94-102, Order, 16 FCC Rcd 18982, 18986-87 (2001).

with less than three cell sites DCS may not be able to provide results which satisfy the Commission's current view of its Phase II requirements.

For DCS's hardware-based solution, in order to meet the Commission's network-based accuracy requirements, Andrew Corporation will need to install Angle-of-Arrival ("AOA") antennas at certain cell sites in addition to the Time Difference of Arrival equipment that will be installed in individual cell sites. DCS has also been informed that installing AOA antennas may require tower modifications, lease modifications, and zoning approvals – any of which present the potential for delay.

DCS brought similar matters to the Commission's attention in its original waiver request.<sup>4</sup> Accordingly, if necessary, DCS may avail itself of further waiver procedures to account for the potential market-specific shortcomings a network-based solution in its rural markets may present. The Commission has indicated that it will consider such requests.<sup>5</sup>

As required by the *Order to Stay*, a copy of this report is being filed with the Chief of the Enforcement Bureau, the Chief of the Wireless Telecommunications Bureau, and the Executive Directors and Counsels of APCO, NENA, and NANSA.

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<sup>4</sup> See DCS Petition for Waiver of Sections 20.18(e), (f), and (h) of the Commission's Rules, CC Docket No. 94-102, at 11-15 (filed Sept. 4, 2001).

<sup>5</sup> See *Order to Stay*, 17 FCC Rcd at 14853.

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
10	Anchorage Police Department	AK	Anchorage Borough	1	TDMA/GSM	04/28/2004		N	N		05/23/2005	2	Dobson has been in contact with local PSAP to discuss deployment. PSAP has experienced delays in the installation of mapping equipment. Dobson plans to schedule testing dates with PSAP in May.
10	Anchorage Police Department	AK	Anchorage Borough	2	TDMA/GSM	04/28/2004		N	N		TBD	2	See Anchorage Phase 1 Comment (Anchorage PSAP Id. 10).
3429	Kalkaska County Central Dispatch	MI	Kalkaska	1	TDMA/GSM	04/30/2001		N	Y	04/08/2002			
3429	Kalkaska County Central Dispatch	MI	Kalkaska	2	TDMA/GSM	10/01/2004		N	Y	04/22/2005			
3459	Mason-oceana 9-1-1-Mason	MI	Mason	1	TDMA/GSM	02/09/2001		N	Y	08/19/2002			
3459	Mason-oceana 9-1-1-Mason	MI	Mason	2	TDMA/GSM	1/9/03 and 9/30/2003		N	Y	04/19/2005		4	Dobson has deployed E-911 Phase II in Mason County and to the extent feasible in Oceana County. Dobson is working with its vendors to further improve the accuracy of the Phase II information provided. In Oceana County, Dobson is unable to deploy in its Air Net sites due to technical difficulties. Dobson is in contact with PSAP and is working with Air Net to fully deploy on these sites.
3454	Manistee County Central Dispatch	MI	Manistee	1	TDMA/GSM	09/01/2000		N	Y	03/19/2002			
3487	Missaukee County Sheriffs Department	MI	Missaukee	1	TDMA/GSM	09/01/2000		N	Y	03/19/2002			
3517	Osceola County Sheriffs Office	MI	Osceola	1	TDMA/GSM	09/01/2000		N	Y	04/25/2002			
3517	Osceola County Sheriffs Office	MI	Osceola	2	TDMA/GSM	04/01/2004		N	Y	04/19/2005			Dobson has deployed E-911 Phase II and is working with its vendors to further improve the accuracy of the Phase II information provided.
3436	Lake County 9-1-1 Central Dispatch	MI	Lake	1	TDMA/GSM	09/01/2000		N	Y	04/09/2002			
3436	Lake County 9-1-1 Central Dispatch	MI	Lake	2	TDMA/GSM	10/23/2003		N	Y	04/19/2005			Dobson has deployed E-911 Phase II and is working with its vendors to further improve the accuracy of the Phase II information provided.
3316	Antrim County Central Dispatch	MI	Antrim	1	TDMA/GSM	09/11/2001		N	Y	10/13/2003			
3316	Antrim County Central Dispatch	MI	Antrim	2	TDMA/GSM	12/20/2004		N	Y	04/27/2005			Dobson has deployed E-911 Phase II and is working with its vendors to further improve the accuracy of the Phase II information provided.
3344	CCE Central Dispatch-Charlevoix	MI	Charlevoix	1	TDMA/GSM	09/01/2000		N	Y	04/08/2002			
3344	CCE Central Dispatch-Charlevoix	MI	Charlevoix	2	TDMA/GSM	12/03/2003		N	Y	04/26/2005			Dobson has deployed E-911 Phase II and is working with its vendors to further improve the accuracy of the Phase II information provided.
3442	Leelanau County Sheriffs Department	MI	Leelanau	1	TDMA/GSM	02/15/2001		N	Y	03/18/2002			

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
3442	Leelanau County Sheriffs Department	MI	Leelanau	2	TDMA/GSM	01/29/2004		N	Y	04/25/2005			Dobson has deployed E-911 Phase II and is working with its vendors to further improve the accuracy of the Phase II information provided.
3587	Wexford County Central Dispatch	MI	Wexford	1	TDMA/GSM	09/01/2000		N	Y	03/19/2002			
3346	CCE Central Dispatch-Emmet	MI	Emmet	1	TDMA/GSM	09/01/2000		N	Y	04/09/2002			
3346	CCE Central Dispatch-Emmet	MI	Emmet	2	TDMA/GSM	12/03/2003		N	Y	04/27/2005			Dobson has deployed E-911 Phase II and is working with its vendors to further improve the accuracy of the Phase II information provided.
3330	Benzie County Sheriffs Department	MI	Benzie	1	TDMA/GSM	09/01/2000		N	Y	04/09/2002			
3330	Benzie County Sheriffs Department	MI	Benzie	2	TDMA/GSM	03/17/2005		N	Y	04/25/2005			Dobson has deployed E-911 Phase II and is working with its vendors to further improve the accuracy of the Phase II information provided.
3396	Grand Traverse County Central Dispatch	MI	Grand Traverse	1	TDMA/GSM	09/01/2000		N	Y	03/18/2002			
3415	Huron County Central Dispatch	MI	Huron	1	TDMA/GSM	09/01/2000		N	Y	02/15/2002			
3415	Huron County Central Dispatch	MI	Huron	2	TDMA/GSM	01/07/2004		N	Y	04/27/2005			Dobson has deployed E-911 Phase II and is working with its vendors to further improve the accuracy of the Phase II information provided.
3550	Sanilac County Central Dispatch	MI	Sanilac	1	TDMA/GSM	09/01/2000		N	Y	02/22/2002			
3550	Sanilac County Central Dispatch	MI	Sanilac	2	TDMA/GSM	11/03/2003		N	Y	04/27/2005			Dobson has deployed E-911 Phase II and is working with its vendors to further improve the accuracy of the Phase II information provided.
3572	Tuscola County Central Dispatch	MI	Tuscola	1	TDMA/GSM	09/01/2000		N	Y	02/13/2002			
3572	Tuscola County Central Dispatch	MI	Tuscola	2	TDMA/GSM	01/07/2004		N	Y	04/27/2005			Dobson has deployed E-911 Phase II and is working with its vendors to further improve the accuracy of the Phase II information provided.
3345	CCE Central Dispatch-Cheboygan	MI	Cheboygan	1	TDMA/GSM	09/01/2000		N	Y	Y			
3345	CCE Central Dispatch-Cheboygan	MI	Cheboygan	2	TDMA/GSM	12/03/2003		N	Y	04/27/2005			Dobson has deployed E-911 Phase II and is working with its vendors to further improve the accuracy of the Phase II information provided.
3308	Alcona County Sheriffs Department	MI	Alcona	2	TDMA/GSM	11/01/2003		N	Y	04/25/2005			Dobson has deployed E-911 Phase II and is working with its vendors to further improve the accuracy of the Phase II information provided.
3317	Arenac County Central Dispatch	MI	Arenac	2	TDMA/GSM	10/31/2003		N	Y	04/21/2005			Dobson has deployed E-911 Phase II and is working with its vendors to further improve the accuracy of the Phase II information provided.
3354	Clare County Central Dispatch	MI	Clare	2	TDMA/GSM	03/03/2004		N	Y	04/21/2005			Dobson has deployed E-911 Phase II and is working with its vendors to further improve the accuracy of the Phase II information provided.

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
3361	Crawford Emergency Central Dispatch	MI	Crawford	2	TDMA/GSM	10/23/2003		N	Y	04/27/2005			Dobson has deployed E-911 Phase II and is working with its vendors to further improve the accuracy of the Phase II information provided.
3420	Iosco County 9-1-1	MI	Iosco	2	TDMA/GSM	08/18/2003		N	Y	04/22/2005			Dobson has deployed E-911 Phase II and is working with its vendors to further improve the accuracy of the Phase II information provided.
3423	Isabella County Central Dispatch	MI	Isabella	2	TDMA/GSM	04/21/2004		N	Y	04/20/2005			Dobson has deployed E-911 Phase II and is working with its vendors to further improve the accuracy of the Phase II information provided.
3451	Mackinac County Sheriffs Department	MI	Mackinac	1	TDMA/GSM	02/15/2001		N	Y	02/02/2005			
3451	Mackinac County Sheriffs Department	MI	Mackinac	2	TDMA/GSM	02/03/2004		N	Y	04/28/2005			Dobson has deployed E-911 Phase II and is working with its vendors to further improve the accuracy of the Phase II information provided.
3461	Meceola Central Dispatch-Mecosta	MI	Mecosta	2	TDMA/GSM	04/01/2004		N	Y	04/20/2005			Dobson has deployed E-911 Phase II and is working with its vendors to further improve the accuracy of the Phase II information provided.
3542	Roscommon County Central Dispatch	MI	Roscommon	2	TDMA/GSM	10/28/2003		N	Y	04/21/2005			Dobson has deployed E-911 Phase II and is working with its vendors to further improve the accuracy of the Phase II information provided.
3495	Muskegon Central Dispatch	MI	Muskegon	2	TDMA/GSM	10/13/2004		N	Y	04/20/2005			Dobson has deployed E-911 Phase II and is working with its vendors to further improve the accuracy of the Phase II information provided.
3504	Newaygo County 9-1-1 Central Dispatch	MI	Newaygo	2	TDMA/GSM	10/21/2003		N	Y	04/19/2005			Dobson has deployed E-911 Phase II and is working with its vendors to further improve the accuracy of the Phase II information provided.
3482	Midland County Central Dispatch	MI	Midland	1	TDMA/GSM	08/16/2000		N	N		05/27/2005	2, 4	Dobson ordered required equipment on 4/21/05. Dobson's 3rd party vendor is in constant contact with PSAP. However, PSAP has not returned routing information to Intrado yet, so the PSAP is not ready. Also, trunking has not been established, but it has been ordered.
3482	Midland County Central Dispatch	MI	Midland	2	TDMA/GSM	01/27/2004		N	N		05/28/2005	2, 4	See Midland County Phase I Comment (PSAP ID 3482)
3313	Alpena County Central Dispatch	MI	Alpena	1	TDMA/GSM	11/16/2004		N	Y	01/19/2005			
3313	Alpena County Central Dispatch	MI	Alpena	2	TDMA/GSM	11/09/2004		N	Y	04/22/2005			Dobson has deployed E-911 Phase II and is working with its vendors to further improve the accuracy of the Phase II information provided.

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
3515	Ogemaw County Sheriffs Department	MI	Ogemaw	2	TDMA/GSM	01/28/2004		N	N	04/21/2005		2	PSAP is not ready to utilize Phase II information. Phase I is working and Dobson has deployed Phase II and will test as soon as PSAP is ready.
3519	Otsego County 9-1-1	MI	Otsego	2	TDMA/GSM	11/21/2003		N	Y	04/27/2005			Dobson has deployed E-911 Phase II and is working with its vendors to further improve the accuracy of the Phase II information provided.
3492	Montcalm County Central Dispatch	MI	Montcalm	2	TDMA/GSM	10/29/2004		N	Y	04/20/2005			Dobson has deployed E-911 Phase II and is working with its vendors to further improve the accuracy of the Phase II information provided.
3309	Alger County Central Dispatch	MI	Alger	2	TDMA/GSM	01/25/2005		N	N		07/25/2005		Dobson is the lessee of RFB Cellular, Inc. and therefore, is not immediately responsible for this PSAP request.
3392	Gladwin County E9-1-1	MI	Gladwin	2	TDMA/GSM	04/04/2005		N	Y	04/21/2005			Dobson has deployed E-911 Phase II, however, PSAP is currently unable to receive Phase II calls. Dobson has left system enabled and will work to resolve potential accuracy issues once PSAP is running.
3763	Caldwell County Sheriffs Office	MO	Caldwell	1	TDMA/GSM	07/23/2003		N	Y	10/13/2004			
3763	Caldwell County Sheriffs Office	MO	Caldwell	2	TDMA/GSM	10/25/2004		N	N		TBD		Dobson is negotiating with the PSAP to develop a mutually agreed upon deployment schedule.
3785	Clinton County Sheriffs Office	MO	Clinton	1	TDMA/GSM	07/23/2003		N	Y	10/13/2004			
3785	Clinton County Sheriffs Office	MO	Clinton	2	TDMA/GSM	10/25/2004		N	N		TBD		Dobson is negotiating with the PSAP to develop a mutually agreed upon deployment schedule.
3795	De Kalb County Sheriffs Office	MO	De Kalb	1	TDMA/GSM	07/23/2003		N	Y	10/13/2004			
3795	De Kalb County Sheriffs Office	MO	De Kalb	2	TDMA/GSM	10/25/2004		N	N		TBD		Dobson is negotiating with the PSAP to develop a mutually agreed upon deployment schedule.
3860	Maryville Police Department	MO	Nodaway	1	TDMA/GSM	08/27/2003		N	Y	08/23/2004			
3879	Nodaway County Sheriffs Department	MO	Nodaway	1	TDMA/GSM	01/21/2004		N	Y	08/23/2004			
3769	Carroll County Sheriffs Office	MO	Carroll	1	TDMA/GSM	07/29/2004		N	N		05/19/2005	2, 4	Dobson has ordered the necessary trunk facilities and expects delivery on 5/16/05. Dobson has been in contact with the PSAP to set a deployment date of 5/19/05.
3769	Carroll County Sheriffs Office	MO	Carroll	2	TDMA/GSM	07/29/2004		N	N		TBD	2, 4	See Carroll County Phase I Comment
3811	Gentry County 9-1-1	MO	Gentry	1	TDMA/GSM	04/04/2005		N	N		10/01/2005		
6423	Bastrop County Sheriffs Office	TX	Bastrop	1	TDMA/GSM	10/12/1999		N	Y	03/18/2001			
6467	Caldwell County Sheriffs Office	TX	Caldwell	1	TDMA/GSM	10/12/1999		N	Y	03/18/2001			
6578	Fayette County Sheriffs Office	TX	Fayette	1	TDMA/GSM	10/12/1999		N	Y	03/18/2001			
6725	Lee County Sheriffs Office	TX	Lee	1	TDMA/GSM	10/12/1999		N	Y	01/15/2001			
6612	Gonzales County Sheriffs Office	TX	Gonzales	1	TDMA/GSM	10/12/1999		N	Y	01/15/2001			
6674	Jackson County Sheriffs Office	TX	Jackson	1	TDMA/GSM	10/12/1999		N	Y	01/15/2001			
6722	Lavaca County Sheriffs Office	TX	Lavaca	1	TDMA/GSM	10/12/1999		N	Y	01/15/2001			



PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
6865	Rockdale Police Department	TX	Milam	1	TDMA/GSM	10/12/1999		N	Y	02/13/2001			
6627	Hamilton County Sheriffs Office	TX	Hamilton	1	TDMA/GSM	10/12/1999		N	Y	02/13/2001			
6575	Falls County Sheriffs Office	TX	Falls	1	TDMA/GSM	10/12/1999		N	Y	02/28/2001			
6587	Freestone Sheriffs Office	TX	Freestone	1	TDMA/GSM	10/12/1999		N	Y	02/28/2001			
6733	Limestone Sheriffs Office	TX	Limestone	1	TDMA/GSM	10/12/1999		N	Y	02/28/2001			
6446	Bosque County Sheriffs Office	TX	Bosque	1	TDMA/GSM	10/12/1999		N	Y	02/28/2001			
6649	Hill County Sheriffs Office	TX	Hill	1	TDMA/GSM	10/12/1999		N	Y	02/28/2001			
6498	Colorado County Sheriffs Office	TX	Colorado	1	TDMA/GSM	10/12/1999		N	Y	02/21/2001			
6592	Ft Bend County Sheriffs Office	TX	Fort Bend	1	TDMA/GSM	10/12/1999		N	Y	02/21/2001			
6757	Matagorda County Sheriffs Office	TX	Matagorda	1	TDMA/GSM	10/12/1999		N	Y	02/21/2001			
6993	Wharton County Sheriffs Office	TX	Wharton	1	TDMA/GSM	10/12/1999		N	Y	02/21/2001			
6796	Navarro County Sheriffs Department	TX	Navarro	1	TDMA/GSM	10/12/1999		N	Y	04/15/2001			
6796	Navarro County Sheriffs Department	TX	Navarro	2	TDMA/GSM	3/9/2005		N	N		09/05/2005		
6572	Erath County Sheriffs Office	TX	Erath	1	TDMA/GSM	10/12/1999		N	Y	04/15/2001			
6572	Erath County Sheriffs Office	TX	Erath	2	TDMA/GSM	3/9/2005		N	N		09/05/2005		
6411	Armstrong County Sheriffs Office	TX	Armstrong	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6476	Carson County Sheriffs Office	TX	Carson	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6496	Collingsworth County Sheriffs Office	TX	Collingsworth	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6547	Donley County Sheriffs Office	TX	Donley	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6817	Pampa Police Department	TX	Gray	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6628	Hansford County Sheriffs Office	TX	Hansford	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6640	Hemphill County Sheriffs Office	TX	Hemphill	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6445	Borger Police Department	TX	Hutchinson	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6735	Lipscomb County Sheriffs Office	TX	Lipscomb	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6827	Perryton Police Department	TX	Ochilree	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6861	Roberts County Sheriffs Office	TX	Roberts	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6995	Wheeler County Sheriffs Office	TX	Wheeler	1	TDMA/GSM	10/12/1999		N	Y	02/23/2001			
6862	Robertson County Sheriff	TX	Robertson	1	TDMA/GSM	10/12/1999		N	Y	04/15/2001			
6464	Burleson County Sheriffs Office	TX	Burleson	1	TDMA/GSM	10/12/1999		N	Y	04/15/2001			
6726	Leon Sheriffs Office	TX	Leon	1	TDMA/GSM	10/12/1999		N	Y	04/15/2001			
6978	Washington County Sheriffs Department	TX	Washington	1	TDMA/GSM	10/12/1999		N	Y	04/15/2001			
6402	Anderson Sheriffs Office	TX	Anderson	1	TDMA/GSM	10/12/1999		N	Y	01/10/2003			
6966	Van Zandt Sheriffs Office	TX	Van Zandt	1	TDMA/GSM	10/12/1999		N	Y	01/10/2003			
6492	Coleman Police Department	TX	Coleman	1	TDMA/GSM	10/12/1999		N	Y	03/08/2001			
6462	Brownwood Police Department	TX	Brownwood	1	TDMA/GSM	10/12/1999		N	Y	03/08/2001			
6500	Comanche County Sheriffs Office	TX	Comanche	1	TDMA/GSM	10/12/1999		N	Y	03/08/2001			
6873	Runnels County Sheriffs Office	TX	Runnels	1	TDMA/GSM	10/12/1999		N	Y	03/08/2001			
6555	Eastland County Central Dispatch	TX	Eastland	1	TDMA/GSM	10/12/1999		N	Y	02/21/2001			
6415	Austin County Sheriffs Department	TX	Austin	1	TDMA/GSM	01/14/2002		N	Y	03/13/2003			
6415	Austin County Sheriffs Department	TX	Austin	2	TDMA/GSM	01/21/2003		N	Y	01/27/2005			Dobson has deployed valid E-911 Phase II and is working with its vendors to further improve the accuracy of Phase II information. Specifically, Dobson has added two cell sites which may improve accuracy results. Dobson has been working closely with PSAP to test, evaluate and improve accuracy results.
6641	Henderson County Sheriffs Department	TX	Henderson	1	TDMA/GSM	01/09/2003		N	Y	08/13/2003			

PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
6641	Henderson County Sheriffs Department	TX	Henderson	2	TDMA/GSM	07/29/2003		N	Y	12/10/2004			Dobson has deployed valid E-911 Phase II and is working with its vendors to further improve the accuracy of Phase II information. Accurate triangulation is difficult due to limited amount of cell sites and distance between those cell sites. Dobson is considering alternative means to improve accuracy.
6911	Somervell County Sheriffs Department	TX	Somervell	2	TDMA/GSM	03/09/2005		N	N		09/05/2005		
3205	Allegany County Emergency Services	MD	Allegany	1	TDMA/GSM	11/21/2003		N	Y	09/22/2004			
3205	Allegany County Emergency Services	MD	Allegany	2	TDMA/GSM	10/18/2004		N	N		TBD		Dobson has no record of receipt of any response from PSAP indicating readiness. Our records do not reflect any recent communication to this effect either. Dobson will be contacting PSAP again to establish deployment schedule.
3236	Washington County Fire Rescue and Com	MD	Washington	1	TDMA/GSM	01/30/2004		N	Y	01/11/2005			
3223	Garrett County Fire and Rescue Commun	MD	Garrett	1	TDMA/GSM	05/05/2004		N	Y	01/18/2005			
3223	Garrett County Fire and Rescue Commun	MD	Garrett	2	TDMA/GSM	01/21/2005		N	N		07/21/2005		
3220	Frederick County Emergency Communicati	MD	Frederick	1	TDMA/GSM	06/03/2004		N	N		TBD	4	Dobson is having difficulty in establishing trunks to the selective router. Dobson is working with the LEC to process the facilities orders.
3220	Frederick County Emergency Communicati	MD	Frederick	2	TDMA/GSM	06/15/2004		N	N		TBD	4	See Phase 1 comment (Frederick County 3220). PSAP has not responded to formal request for necessary Richardson documentation. Our records reflect that there have been no recent communications, but Dobson is attempting to contact PSAP to work out deployment schedule.
5887	Erie County 9-1-1 Center	PA	Erie	1	TDMA/GSM	04/12/2001		N	Y	02/06/2002			
5887	Erie County 9-1-1 Center	PA	Erie	2	TDMA/GSM	04/12/2001		N	Y	10/30/2003 (TDMA only)	GSM - TBD		Dobson has deployed TDMA Phase II service. GSM E911 service is not currently operating but Dobson is working with 3rd party vendor to deploy request.
5878	Crawford County Office of Emergency Serv	PA	Crawford	1	TDMA/GSM	03/26/2002		N	Y	02/19/2003			
5031	Allegany County Sheriffs Office	NY	Allegany	1	TDMA/GSM	07/18/2002		N	Y	03/26/2003			
5031	Allegany County Sheriffs Office	NY	Allegany	2	TDMA/GSM	06/09/2003		N	Y	4/1/2004 (TDMA only)	GSM - TBD		Dobson has deployed TDMA Phase II service. GSM E911 service is not currently operating but Dobson is working with 3rd party vendor to deploy request.
5048	Cattaraugus County Sheriffs Office	NY	Cattaraugus	1	TDMA/GSM	05/22/2001		N	Y	08/06/2002			

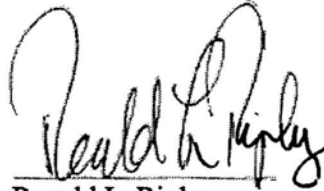
PSAP ID	PSAP Name	PSAP State	PSAP County	Implementation Phase	Air Interface	Date PSAP Request Made	Date PSAP Request Withdrawn	Invalid Request	Deployed	Date Deployed	Date Projected	Reasons	Comment
5048	Cattaraugus County Sheriffs Office	NY	Cattaraugus	2	TDMA/GSM	06/05/2002		N	Y	4/15/2004 (TDMA only)	GSM - TBD		Dobson has deployed TDMA Phase II service. GSM E911 service is not currently operating but Dobson is working with 3rd party vendor to deploy request. Dobson is scheduling testing with the PSAP and third party vendor to physically test call accuracy.
5051	Chautauqua County Sheriffs Office	NY	Chautauqua	1	TDMA/GSM	06/01/2001		N	Y	05/17/2002			
5051	Chautauqua County Sheriffs Office	NY	Chautauqua	2	TDMA/GSM	12/13/2002		N	Y	4/20/2004 (TDMA only)	GSM - TBD		Dobson has deployed TDMA Phase II service. GSM E911 service is not currently operating but Dobson is working with 3rd party vendor to deploy request.
5084	Genesee County Sheriffs Office	NY	Genesee	1	TDMA/GSM	04/10/2001		N	Y	11/21/2002			
5084	Genesee County Sheriffs Office	NY	Genesee	2	TDMA/GSM	09/09/2002		N	Y	11/13/2003 (TDMA only)	GSM - TBD		Dobson has deployed TDMA Phase II service. GSM E911 service is not currently operating but Dobson is working with 3rd party vendor to deploy request.
5608	Chickasha Police Department	OK	Grady	1	TDMA/GSM	11/1/2004		N	Y	3/10/2005			
5608	Chickasha Police Department	OK	Grady	2	TDMA/GSM	3/10/2005		N	N		09/10/2005		

**AFFIDAVIT OF RONALD L. RIPLEY**

I, Ronald L. Ripley, do hereby declare that the following is true and accurate:

am an officer of Dobson Cellular Systems, Inc. ("DCS").

I have reviewed the DCS E911 Quarterly Report ("Report") and to the best of my knowledge, information, or belief, all of the information contained in the Report is truthful and accurate.

A handwritten signature in black ink, appearing to read "Ronald L. Ripley", written over a horizontal line.

Ronald L. Ripley  
Senior Vice President &  
General Counsel

Executed on: May 2, 2005

## CERTIFICATE OF SERVICE

I, Ernestine M. Screven, hereby certify that on the 2<sup>nd</sup> day of May 2005, copies of the foregoing "E911 Quarterly Report" have been served by either first class mail, postage prepaid to the following:

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Ernestine M. Screven